

REMARKS

Claims 1 to 26 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 1 to 26 have been rejected under 35 U.S.C. 112, first paragraph, as containing subject matter which was not described in the specification in such a way to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention, and fails to enable the claims. The Examiner stated that "independent claims 1, 3, and 15 are claiming a controller for controlling position of display and another controller for controlling the orientation of a visual recording device; the applicant describes adjusting [a] position of [the] display and a visual recording device in pages 18-20 but does not specify, 'How does the controlling section work? Does it control by a person or by a machine?'"

In rejecting a claim under 35 U.S.C. 112, first paragraph, the Examiner must set forth express findings of fact which support the lack of written description conclusion. These findings should: (A) Identify the claim limitation at issue; and (B) Establish a *prima facie* case by providing reasons why a person skilled in the art at the time the application was filed would not have recognized that the inventor was in possession of the invention as claimed in view of the disclosure of the application as filed.

The Examiner has not provided reasons why a person skilled in the art at the time the application was filed would not have recognized that the inventor was in possession of the invention as claimed in view of the disclosure of the application as filed. Therefore, it is believed that a *prima facie* case under 35 U.S.C. 112, first paragraph has not been established.

Further, the specification provides, for example, in Figures 1, and 4 to 9, and at pages 18 to 30, a description of the sending controller and receiving controller for controlling a position and orientation of a signal display and selecting and adjusting the position, orientation, and zoom of a visual recording device, respectively. Accordingly, the sending controller and receiving controller would be understood to others skilled in the art as a system and/or method for controlling a position and orientation of a signal display and selecting and adjusting the position, orientation, and zoom of a visual recording device, respectively.

Further still, regarding the Examiner's statement that "there are many methods and procedures (hardware/software) available or can be modify to obtain proper results" at page 2 of Paper No. 4, the availability of different methods and systems that satisfy claimed limitations is not believed to be sufficient proof that the application has not satisfied the enablement requirement under 35 U.S.C. 112, first paragraph. For example, a patent is a starting point and it discloses basic information by which one could practice the invention in a laboratory setting, thus an inventor may begin at the point where the invention begins, and describe what is new, and what it replaces of the old. That which is common and well known is as if it were written out in the patent and delineated in the drawings. Indeed, it is common knowledge that patent specifications need not be so detailed as production specifications. Therefore, the Examiner's reconsideration of the rejection is respectfully requested.

Claims 1, 2, 4, 5, 6, 8, 10, 13, 14, 16 to 18, 20, 22, 25, and 26 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

Referring to claim 1, the Examiner stated that, "a signal display controller' is not clear whether the applicant means the signal (signal conditioning) of display controller or signal of

display controller (position of display).” The Examiner clarified the rejection at page 3 of Paper No. 4 (bullet 1), stating that claim 1 is indefinite “because the phrases in claim 1, line 5, ‘a generated signal’, and line 7, ‘a signal display’ and ‘signal pattern’ and line 8 ‘signal template’, and line 9 ‘a signal display controller.’ The lack of clarity arises where the claim 1 refers to which one of those signals and it is not clear whether the phrases are having the same interpretation or not.” Respectfully, Applicant is unsure how the term “signal display controller” could be read as including the preposition “of” as the Examiner suggests, such as, “signal of display controller”. (Emphasis added.) The claimed term is clearly “signal display controller.” Further, other phrases, which also include the word “signal” are clearly delineated by other words in the respective phrase, such as “a *generated signal template*,” “a signal *receiving device*,” or “a signal *pattern*,” and is therefore believed to be definite and claim 1 is believed to be allowable. (Emphasis added.)

Regarding claims 2, 4, 5, 6, 8, 10, 13, 14, 16 to 18, 20, 22, 25, and 26, the Examiner has offered conclusory statements that various limitations are “not specified” (claim 2), are “not defined” (claims 6 and 18), are “not defined explicitly” (claims 4, 5, 16, and 17), “must be defined” (claims 8 and 20), “needs to be shown by mathematical equations” (claims 10 and 22), or “need to be well demonstrated” (claims 13, 14, 25, and 26) in the specification. However, no evidence has been presented that one of ordinary skill in the pertinent art, when reading the claims in light of the supporting specification, would not have been able to ascertain with a reasonable degree of precision and particularity the particular area set out and circumscribed by the claims. Further, it is not believed to be the case that the claims are required to present “very constructive” limitations (see page 3 of Paper No. 3, bullet 2). Therefore, it is believed that a *prima facie* case of indefiniteness under 35 U.S.C. 112, second paragraph has not been made,

and claims 2, 4, 5, 6, 8, 10, 13, 14, 16 to 18, 20, 22, 25, and 26 are believed to be allowable. Further, claims 2, 4, 5, 6, 8, 10, 13, 14, 16 to 18, 20, 22, 25, and 26 are believed to be allowable for at least the additional reasons set forth below.

Referring claim 2, the Examiner stated that, "the type of mirror is not specified in the specification." The rejection is unclear. Is the Examiner rejecting the claim because the claim are believed to be unclear (35 U.S.C.112, second paragraph) or because the specification's disclosure is believed to be inadequate to support the claim (35 U.S.C.112, first paragraph)? Moreover, mirrors are disclosed at, for example, page 37, lines 7 to 10. One of ordinary skill in the pertinent art, when reading the claims in light of the supporting specification, would have been able to ascertain with a reasonable degree of precision and particularity that any mirror that enables communication among embedded devices can be used.

Referring to claims 4 and 16, the Examiner stated that, "the steps not defined explicitly in specification as follows: how the image is dividing; how the centers are determining; required more formulation for look-up table; how the circles are creating; and the formulations of decoding a pattern." Claims 4 and 16 are supported in the specification by, at least, Figures 12, 14, 16, 17, and 18, and the description found at pages 34 to 36. "Dividing the image of the signal pattern into a plurality of blocks" and "determining the centers of said blocks using a position and radius look-up table" are defined at, for example, page 35, lines 4 to 8. "Creating a plurality of circles within said blocks having corresponding centers and radiuses determined by the position and radius look-up table" is defined at, for example, page 35, lines 8 to 11. "Decoding a pattern..." is defined at, for example, page 35, line 16 to page 36, line 2.

Referring to claims 5 and 17, the Examiner stated that, "the steps are not defined explicitly in specification as follows: what is within an allotted time; method of calculating

image differences is not specified in specification; and also the method of how is collecting a plurality of blobs.” The subject matter of claims 5 and 17 is described, for example, with reference to Figure 10, and in the disclosure at pages 30 to 32. An allotted time is defined at, for example, page 30 lines 15 to 17. “Calculating image differences of consecutive alternating images” is defined at, for example, page 30, line 17 to page 31, line 11. “Collecting a plurality of blobs...” is defined at, for example, page 32, lines 7 to 10.

Referring to claims 6 and 18, the Examiner stated that the step of automatically adjusting is not defined in the specification. Automatically adjusting is described by, at least, Figure 6 and the description found at page 22, line 3 to page 23, line 13.

Referring to claims 8 and 20 the Examiner stated that, “the step of groups of pixels value must be defined.” Claims 8 and 20 claim, “wherein the blobs are groups of adjoining pixels each having an identical pixel value.” Respectfully, Applicant is unable to identify a step in claims 8 and 20 to be defined.

Referring now to claims 10 and 22, the Examiner stated that, “the step of panning for a position that does not overlap the first pan position needs to be shown by mathematical equations and panning positions should be specified on the screen scans horizontally or vertically, and it is not specified in the claim.”

Claims 10 and 22 claim, *inter alia*, “panning for a position that does not overlap the first pan position.” Claims 10 and 22 set forth the subject matter that the applicant regards as the invention, and the scope of the claims is believed to be clear to a person possessing the ordinary level of skill in the pertinent art. Respectfully, one of ordinary skill in the art would understand how to pan for a position that does not overlap the first pan position. Further, the term “panning” clearly indicates a direction.

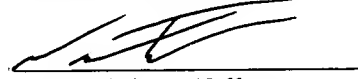
Referring to claims 13, 14, 25, and 26, the Examiner stated that, "the limitation and boundary condition of vertical positions need to be well demonstrated in specification." The rejection is unclear. Is the Examiner rejecting the claims because the claims are believed to be unclear (35 U.S.C.112, second paragraph) or because the specification's disclosure is believed to be inadequate to support the claims (35 U.S.C.112, first paragraph)? Moreover, the tilt position is described throughout the disclosure, for example, at page 24, lines 2 to 8.

The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including claims 1 to 26, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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